UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CERTAIN UNDERWRITING MEMBERS AT LLOYD'S OF LONDON,

NO: 1: 16-CV-00323

Petitioners,

V.

NOTICE OF PETITIONERS' MOTION TO VACATE ARBITRATION AWARD

PURSUANT TO 9 USC §10

INSURANCE COMPANY OF THE AMERICAS,

Respondent.

PLEASE TAKE NOTICE that as soon as counsel may be heard at a date convenient to Judge Vernon Broderick, Petitioners will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 518, New York, New York, before the Honorable Vernon Broderick, United States District Judge for an order pursuant to Section 10 of the Federal Arbitration Act, 9 U.S.C. §10, vacating the arbitration award entered in this matter on October 19, 2015.

PLEASE TAKE FURTHER NOTICE that in support of this motion Petitioners will rely upon this Notice of Motion, Petitioners' Memorandum of Law in Support of Motion to Vacate, and the Declaration of Timothy Stalker, Esq. together with its Exhibits submitted herewith.

PLEASE TAKE FURTHER NOTICE that Petitioners request oral argument.

WEBER GALLAGHER SIMPSON STAPLETON FIRES & NEWBY LLP

By:

Kenneth M. Portner, Esquire 2000 Market Street; 13th Floor Philadelphia, PA 19103

Tel: (215) 972-7921

Email: kportner@wglaw.com

Dated: January 15,2016